

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

- - - - -

Jessie Cantrell, as :  
Personal  
Representative of the :  
Estate of Cory  
Cantrell, :  
  
Plaintiff, : Case No. 1:22-cv-00739  
vs. : Judge Douglas R. Cole  
  
Scioto County, Ohio, :  
et al., :  
  
Defendants. :  
:

- - - - -

DEPOSITION OF DANIEL VASQUEZ  
VIA VIDEOCONFERENCE

- - - - -

Witness Located at the Residence of Daniel Vasquez  
Oakley, California 94561  
December 19, 2024, 3:07 p.m.

- - - - -

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By Andrew N. Yosowitz, Esq. (via Zoom)

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## Thursday Afternoon Session

December 19, 2024, 3:07 p.m.

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## S T I P U L A T I O N S

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6           It is stipulated by counsel in attendance that  
7       the deposition of Daniel Vasquez, a witness  
8       herein, called by the Defendants for  
9       cross-examination, may be taken at this time by  
10      the notary pursuant to notice and subsequent  
11      agreement of counsel that said deposition may be  
12      reduced to writing in stenotypy by the notary,  
13      whose notes may thereafter be transcribed out of  
14      the presence of the witness; that proof of the  
15      official character and qualification of the notary  
16      is waived.

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1	I N D E X	
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18	(PDF exhibits have been provided to counsel with the transcript. No hard copies were in the possession of the court reporter.)	
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(PDF exhibits have been provided to counsel with the transcript. No hard copies were in the possession of the court reporter.)

1                   THE REPORTER: Before I swear in the  
2 witness, would counsel please identify yourself  
3 for the record, state who you represent, and  
4 express your stipulation that this deposition may  
5 take place with a remote administration of the  
6 oath and remote reporting of the deposition.  
7 Let's begin with the noticing attorney.

8                   MR. YOSOWITZ: Andrew Yosowitz for the  
9 defendants, and we stipulate to the remote  
10 deposition and remote administration of the oath.

11                  MR. GREEN: Brian Green for plaintiff.  
12 We so, too, stipulate.

13                  - - - - -

14                  DANIEL VASQUEZ  
15 being first duly sworn, testifies and says as  
16 follows:

17                  CROSS-EXAMINATION

18 BY MR. YOSOWITZ:

19 Q.               Good afternoon. Your name is Daniel  
20 Vasquez, correct?

21 A.               That's correct.

22 Q.               My name is Andrew Yosowitz. We're here  
23 today for your deposition. This is my client's  
24 pretrial opportunity to question you via Zoom

1       about an expert report that you prepared in this  
2       case. I would ask that you give the same sincere  
3       cooperation as if a judge and jury were listening.

4                          Do you understand that?

5       A.                  Yes, I do.

6       Q.                  You're here today with -- well, you're  
7       here virtually with attorney Brian Green, correct?

8       A.                  Correct.

9       Q.                  Okay. Please understand that even  
10      though we're all in an informal setting,  
11      everything you say here is just as important as if  
12      we were at trial in a courtroom with the judge and  
13      jury listening. Therefore, it's in your very best  
14      interest to give the most complete, accurate and  
15      truthful answers you can to each and every one of  
16      my questions.

17                          Do you understand that?

18       A.                  Yes, I do.

19       Q.                  Please understand that the court  
20      reporter will produce a transcript of everything I  
21      say, everything you say and everything Mr. Green  
22      says while we're on the record. For this reason,  
23      I need all of your answers to be out loud. The  
24      court reporter cannot transcribe nonverbal

1 responses.

2 Do you understand that?

3 A. Yes, I do.

4 Q. You're going to have an opportunity to  
5 review your transcript and you may make changes to  
6 that transcript. If you do make any changes to  
7 your testimony, however, I may ask the Court to  
8 allow me to reopen the deposition and question you  
9 about any changed testimony. I may also argue to  
10 a judge and jury that the changes to your  
11 testimony raise questions about your credibility.

12 Do you understand that?

13 A. Yes.

14 Q. Is there any physical, mental or  
15 emotional reason why you can't give your most  
16 accurate testimony today?

17 A. No, there is not.

18 Q. Are you under the influence of any  
19 substance that would impair your ability to tell  
20 the truth?

21 A. No.

22 Q. I'm going to give each of your words  
23 their most common meaning unless you tell me that  
24 a word has a meaning that is special to you.

1                   Do you understand that?

2   A.           Yes.

3   Q.           Okay. Please be sure to allow me to  
4                 complete the entire question before you begin your  
5                 answer. Otherwise, as you'll see, I'll repeat the  
6                 entire question from the beginning so that we can  
7                 produce a clean record.

8                   Do you understand that?

9   A.           Yes, I do.

10   Q.           Okay. Do you understand that the oath  
11          you took requires you to tell the whole truth, to  
12          give all the information each question requests in  
13          a straightforward manner, and in so doing, to use  
14          the most candid and accurate language you possibly  
15          can?

16   A.           Yes, I understand that.

17   Q.           Do you have any questions for me before  
18          I begin my questions?

19   A.           No.

20   Q.           Are there any materials that you've  
21          reviewed for this case that are not listed in your  
22          expert report dated December 7, 2023?

23   A.           I reviewed the Sweeney report and also  
24          captain, what's his name, Captain Damon Roberts.

1 Q. His deposition?

2 A. Yes.

3 Q. Anything else?

4 A. No.

5 Q. Are all the opinions that you intend to  
6 offer in this case contained in your expert report  
7 dated December 7, 2023?

8 A. Yes.

9 Q. Do you have any changes to make to your  
10 report at this time?

11 A. No.

12 Q. And what did you do to prepare for  
13 today's deposition?

14 A. I reviewed -- re-reviewed some of the  
15 reports that we just discussed.

16 Q. And other than your -- other than the  
17 attorneys that have hired you, did you speak with  
18 anyone about today's deposition?

19 A. No.

20 Q. Okay. In your report dated December 7,  
21 2023, you do not opine that any of the Scioto  
22 County Sheriff's Office policies and procedures  
23 were inadequate or deficient, correct?

24 A. Correct.

1 Q. Okay. Your opinion is that various  
2 jail employees failed to follow the Scioto County  
3 Sheriff's Office policies and procedures, correct?

4 A. Yes. One in particular.

5 Q. Okay. Based on your review of the  
6 policies and procedures and the testimony in this  
7 case, a prisoner entering the Scioto County Jail  
8 goes through multiple searches before he or she is  
9 admitted to general population, correct?

10 A. Yes.

11 Q. Okay. In fact, the policy requires  
12 that all inmates are searched for contraband and  
13 weapons during the reception process, correct?

14 A. Correct.

15 Q. And you would agree that searching  
16 inmates for contraband and weapons during the  
17 reception process is reasonable and appropriate,  
18 correct?

19 A. Yes, it is.

20 Q. After the initial search, it's your  
21 understanding that inmates at the Scioto County  
22 Jail who have or will have criminal charges are  
23 put through the body scanner, correct?

24 A. Correct.

1 Q. And a body scanner is a tool for  
2 contraband detection, correct?

3 A. It is.

4 Q. Body scanners use some form of  
5 radiation, such as x-rays or millimeter wave rays  
6 to create an image which can detect metallic and  
7 non-metallic items underneath clothing and hidden  
8 in body cavities, correct?

9 A. That's my understanding, yes.

10 Q. And to your knowledge, body scanners  
11 are the most recent technology jails and prisons  
12 have to detect contraband on or inside the human  
13 body, correct?

14 A. Correct.

15 Q. Are you familiar with body scanners?

16 A. Yes, I am to some degree.

17 Q. Have you ever been trained on one?

18 A. No.

19 Q. Have you ever operated a body scanner?

20 A. No.

21 Q. What experience do you have with body  
22 scanners?

23 A. That they're intended to try to locate  
24 secreted contraband inside a person's body.

1 Q. You understand that even body scanners  
2 have difficulty picking up some materials,  
3 correct?

4 A. Yes. They're not totally  
5 100 percent --

6 Q. A body scanner is a tool for detection  
7 of contraband and weapons, it's not perfect,  
8 correct?

9 A. That is correct.

10 Q. And based on your understanding of body  
11 scanners and their use in corrections, you  
12 understand it's difficult for body scanners to  
13 pick up pills and powders because powders lack  
14 density, correct?

15 A. My understanding, yes.

16 Q. And it's more -- even more difficult to  
17 pick up pills and powders if they are hidden  
18 within a person's body cavity, correct?

19 A. Correct.

20 Q. Nevertheless, to assist with contraband  
21 detection, it's reasonable and appropriate for the  
22 Scioto County Jail to use the body scanner on  
23 every inmate who enters the jail, correct?

24 A. If that's their decision, yes.

1 Q. Okay. In fact, Perry Steele, in this  
2 case, was body scanned on June 18th, 2022, before  
3 he entered his cell with Cory Cantrell, correct?

4 A. According to the reports, yes.

5 Q. You don't have any evidence from your  
6 review of the case that there was any discernible  
7 contraband on Perry Steele's June 18, 2022, body  
8 scan, correct?

9 A. That's correct. I do not have any  
10 other information other than what I read in the  
11 report.

12 Q. And then after the body scan, inmates  
13 at the Scioto County Jail are then strip searched,  
14 correct?

15 A. That's a decision of the county  
16 staff -- county jail staff if they want to do a  
17 strip search, but not all inmates are strip  
18 searched.

19 Q. Well, you -- you've read their policy  
20 721, which states that all inmates are going to be  
21 strip searched, correct?

22 A. Yes, that's correct. I'm sorry about  
23 that.

24 Q. And you're familiar with strip searches

1       from your time working in corrections, correct?

2       A.           Oh, yes.

3       Q.           Okay. And so during a strip search,  
4                  the prisoner must remove all of their clothing  
5                  while he or she is observed by an officer of the  
6                  same sex, correct?

7       A.           Yes.

8       Q.           And this is another search for  
9                  contraband, correct?

10      A.           Yes.

11      Q.           And it's reasonable and appropriate to  
12                 search inmates during the booking process,  
13                 correct?

14      A.           Yes.

15      Q.           That was the wrong question. I missed  
16                 a word.

17                 It's reasonable and appropriate to  
18                 strip search inmates during the booking process,  
19                 correct?

20      A.           If that's a decision up to the jail  
21                 staff, yes.

22      Q.           When you were at the Santa Clara Jail,  
23                 you strip searched inmates before they entered  
24                 general population, correct?

1 A. They were strip searched by my staff,  
2 yes.

3 Q. Sure. I would imagine that the warden  
4 would not do the strip search?

5 A. That's correct.

6 Q. So there's at least three searches  
7 conducted on inmates entering the Scioto County  
8 Jail, an initial pat-down search, a body scan and  
9 a strip search, correct?

10 A. Yes.

11 Q. Okay. And in your experience as a law  
12 enforcement officer, arresting officers also  
13 conduct a search of their prisoner at the time of  
14 arrest, correct?

15 A. That's correct.

16 Q. And we call that -- for those of us who  
17 do criminal law, we call that a search incident to  
18 arrest, correct?

19 A. Yes.

20 Q. The Scioto County Sheriff's Office also  
21 conducts weekly shakedowns of selected housing  
22 areas to discover, remove and prevent contraband,  
23 correct?

24 A. Yes.

1 Q. And you're familiar with the term  
2 "shakedown," correct?

3 A. Yes.

4 Q. Okay. A shakedown is essentially a  
5 cell search to look for contraband, correct?

6 A. Correct.

7 Q. Sometimes that's also called tossing  
8 cells. Have you heard that term before?

9 A. I have.

10 Q. Okay. What did you call it at the  
11 Santa Clara Jail?

12 A. It was just a search of the -- just a  
13 search of the housing unit or cell occupied by an  
14 inmate.

15 Q. And in this case -- relevant to this  
16 case, Officer Tackett conducted a shakedown of  
17 holding cell five on June 18, 2022, at 11:05 a.m.,  
18 correct?

19 A. Yes.

20 Q. And Officer Tackett took out all of the  
21 old mats, mattresses and bed rolls and issued new  
22 mats and bed rolls because inmates can hide  
23 contraband in their mats and bed rolls, correct?

24 A. Correct.

1 Q. And you would agree with me that  
2 conducting shakedowns is a reasonable and  
3 appropriate method to assist in the detection of  
4 contraband, correct?

5 A. Yes.

6 Q. You would agree with me that it's  
7 important to prosecute inmates and staff members  
8 who illegally convey contraband into the Scioto  
9 County Jail, correct?

10 A. Yes.

11 Q. And based on your review of the records  
12 in this case, it's true that the Scioto County --  
13 that Scioto County does prosecute inmates and  
14 staff members who illegally convey contraband into  
15 the jail, correct?

16 A. Yes.

17 Q. You're aware -- strike that.

18 This case deals with events that  
19 occurred in the year 2022, correct?

20 A. Correct.

21 Q. Okay. And you're aware that the Scioto  
22 County Jail was inspected in 2022 and found to be  
23 in compliance with all essential jail standards in  
24 Ohio and all of the contraband detection

1 standards, correct?

2 A. I'm not aware of any -- any of that  
3 information.

4 Q. Okay. Were you not provided the 2022  
5 Bureau of Adult Detention inspection report?

6 A. Not that I recall, no.

7 Q. Okay. And you would agree with me that  
8 the Scioto County Jail has reasonable policies and  
9 practices to prevent the introduction of  
10 contraband into the jail, correct?

11 A. Yes.

12 Q. Okay. Turning to Cory Cantrell, the  
13 decedent in this case. He was originally booked  
14 into the Scioto County Jail on January 19, 2022,  
15 correct?

16 A. Yes.

17 Q. And he was booked in for a probation  
18 violation, correct?

19 A. Correct.

20 Q. And the underlying charge for which he  
21 was on probation had nothing to do with drugs,  
22 right?

23 A. I don't recall what the reasons were,  
24 but he was booked for probation violation.

1 Q. Do you -- you're in California, right?

2 A. Correct, northern California.

3 Q. And your law enforcement career has  
4 been in California, correct?

5 A. Yes.

6 Q. Okay. Do they have, like, domestic  
7 protection orders in California?

8 A. You mean domestic violence protection?

9 Q. Right.

10 A. Yes, they do.

11 Q. Okay. And if I -- if I told you that  
12 Mr. Cantrell's underlying charge was violation of  
13 a protection order, does that refresh your memory  
14 as to why --

15 A. No. It doesn't at this point, no.

16 Q. Okay. During the booking process,  
17 Mr. Cantrell underwent a preliminary medical  
18 screen, correct?

19 A. Yes.

20 Q. Okay. And the preliminary medical  
21 screen consists of both booking officer  
22 observations and questions to be answered by the  
23 inmate, correct?

24 A. Yes.

1 Q. And the purpose of the preliminary  
2 medical screen is to see if there's any medical  
3 problem that requires immediate attention,  
4 correct?

5 A. Correct.

6 Q. Unless there's something obvious that  
7 the corrections officer can see, the corrections  
8 officer's relying on the inmate to provide him or  
9 her with truthful medical information, correct?

10 A. Yes.

11 Q. Corrections officers do not and should  
12 not have access to an inmate's medical records,  
13 correct?

14 A. Correct.

15 Q. Only medical staff should have access  
16 to the inmate's medical records, correct?

17 A. Yes, that's correct.

18 Q. And on January 19, 2022, Cory Cantrell  
19 did not report any medical problem requiring  
20 immediate attention, correct?

21 A. That's correct.

22 Q. You're not aware -- strike that.

23 Are you familiar with the National  
24 Commission on Correctional Healthcare?

1 A. To some degree, yes, I've reviewed it  
2 many -- sometime before.

3 Q. Okay. And the National Commission on  
4 Correctional Healthcare puts out sample policies  
5 and best practices, correct?

6 A. Correct.

7 Q. Okay. You're not aware of any Ohio  
8 regulation or guideline from the National  
9 Commission on Correctional Healthcare that  
10 mandates jail booking officers to review every  
11 single prior preliminary medical screen of an  
12 inmate, correct?

13 A. Correct.

14 Q. On April 4th, 2022, Cory Cantrell was  
15 sentenced to 10 months in the Scioto County Jail,  
16 correct?

17 A. Yes.

18 Q. Okay. So at that point, Cory Cantrell  
19 was no longer a pretrial detainee, he was a  
20 convicted prisoner serving a sentence, correct?

21 A. Yes.

22 Q. Okay. The Court approved Cory Cantrell  
23 for work release, right?

24 A. Yes.

1 Q. Okay. In your report -- you wrote on  
2 page 10 of your report, you wrote that the jail  
3 staff allowed Mr. Cantrell to be on work release.

4 Is that right?

5 A. Yes, that's correct.

6 Q. But the work release was court ordered,  
7 right?

8 A. Yes, it was.

9 Q. Okay. The jail's got to follow the  
10 court orders, correct?

11 A. Yes.

12 Q. Okay. And on April 7th, 2022, Cory  
13 Cantrell overdosed while he was on work release,  
14 correct?

15 A. I think when he returned from work  
16 release.

17 Q. Okay. What -- what's your basis --  
18 well, strike that.

19 Based on your review of the records, do  
20 you recall Cory Cantrell overdosing outside the  
21 jail while he was on work release?

22 A. Yes, I do.

23 Q. Okay. And at the time he was on work  
24 release and outside the jail, he wasn't under the

1 supervision of the Scioto County Sheriff's Office,  
2 correct?

3 A. I'm not sure whose supervision he was  
4 under.

5 Q. Okay. After he overdosed outside the  
6 jail, he was furloughed for treatment at a  
7 hospital called Southern Ohio Medical Center,  
8 correct?

9 A. Correct.

10 Q. And he was instructed to report back to  
11 the jail after they released him, correct?

12 A. Yes.

13 Q. Okay. And so the medical staff at the  
14 Southern Ohio Medical Center on April 7th cleared  
15 Cantrell for release, correct?

16 A. That's correct, back to the jail.

17 Q. Back to the jail. And when he came  
18 back to the jail, since he had been furloughed, he  
19 was rebooked as, like, a new prisoner on  
20 April 7th, 2022, correct?

21 A. I don't recall that, but I know he was  
22 returned back to the jail.

23 Q. Okay. Do you recall reviewing a new  
24 set of booking records on -- from April 7th, 2022?

1 A. No.

2 Q. Okay.

3 A. Not at this point.

4 Q. All right. All right. Now we're  
5 getting to things in the jail.

6 On April 9th, 2022, at 2:55 a.m.,  
7 Cantrell was found unresponsive in holding cell  
8 five, correct?

9 A. Correct.

10 Q. Okay. And Officers Tackett and Carver  
11 administered Narcan to Mr. Cantrell, correct?

12 A. Yes.

13 Q. And then Cantrell was transported to  
14 the hospital Southern Ohio Medical Center,  
15 correct?

16 A. Yes.

17 Q. All right. You don't have any issue  
18 with how Officers Tackett and Carver responded to  
19 Mr. Cantrell's overdose, correct?

20 A. No.

21 Q. Okay. After Cantrell went to the  
22 hospital, a search of holding cell five was  
23 conducted at 8:22 a.m., correct?

24 A. I'm not aware of that, but yeah.

1 Q. All right. Well, let's take a look at  
2 that. Okay. I'm going to share my screen with  
3 you.

4 A. Okay.

5 Q. Standby. See if I can do this. Share.  
6 Okay. You should see something that  
7 looks like an incident report on your screen.

8 Do you see that?

9 A. Yes, I do.

10 - - - - -

11 Thereupon, Defendants' Exhibit 1 is marked  
12 for purposes of identification.

13 - - - - -

14 Q. Okay. So we're talking about  
15 April 9th, 2022. And my question -- this will be  
16 exhibit -- this can be Exhibit 1. I should write  
17 that down.

18 Go ahead and take a look at that and  
19 tell me when you've read it.

20 A. Okay. Yes, I read it.

21 Q. Okay. So you've had a chance to take a  
22 look at what we've marked as Exhibit 1, an  
23 incident report from April 9th at 8:22 --  
24 April 9th, 2022, at 8:22.

1                   And my question was: A search of  
2 holding cell five was conducted at 8:22, correct?

3   A.           That's correct.

4   Q.           Okay. And the search revealed that a  
5 toilet paper role had tissue paper stuffed on each  
6 end, correct?

7   A.           Yes.

8   Q.           And inside there was an object wrapped  
9 in black electrical tape, correct?

10   A.           That was found, yes.

11   Q.           Okay. And so what the corrections  
12 officers did was collect that as evidence for  
13 analysis and turned it over to the detective  
14 bureau, correct?

15   A.           Correct.

16   Q.           Okay. And because Mr. Cantrell had  
17 overdosed in holding cell five, it was reasonable  
18 and appropriate to search holding cell five,  
19 collect any contraband and turn it over to  
20 detectives for further investigation, correct?

21   A.           Yes.

22   Q.           About 12 hours later, at 8:46 p.m.,  
23 Officer Ness caught inmates from holding cell six  
24 trying to slide a crystal-like substance to a

1       female outside of the holding cells who was on the  
2 phone, correct?

3       A.           I'm sorry, repeat that question again.

4       Q.           Sure. You know what, let's also --  
5 we'll just move to -- so I've moved down to an  
6 incident report dated April 9th, 2022, at 2046, or  
7 8:46.

8                  Why don't you take a look at that  
9 incident report.

10      A.           Okay.

11      Q.           Tell me when you're ready.

12      A.           Okay.

13      Q.           You reviewed these incident reports as  
14 part of your review of the case, correct?

15      A.           Yes.

16      Q.           Okay. So at 8:46 p.m. on April 9th,  
17 2022, Officer Ness catches inmates from holding  
18 cell six trying to slide a crystal-like substance  
19 to a female who's outside of the holding cells and  
20 on the phone, correct?

21      A.           Yes.

22      Q.           And then officers searched holding cell  
23 six and recovered a clear baggie with a  
24 brownish-white substance and a black ball of tape,

1       correct?

2       A.           Yes.

3       Q.           And the crystal-like substance and  
4       brownish-white substance were turned over to the  
5       detective bureau for further analysis and  
6       investigation, correct?

7       A.           That's correct.

8       Q.           Okay. And so this incident shows that  
9       officers at the jail, they're watching for  
10      potential contraband, correct?

11      A.           Yes.

12                  MR. GREEN: Objection.

13                  You can answer.

14      Q.           Okay. And when any contraband is  
15      found, the officers are searching the cell from  
16      which it came, and that's reasonable and  
17      appropriate, correct?

18                  MR. GREEN: Objection.

19                  You can answer.

20      A.           Yes.

21      Q.           And the officers are also turning over  
22      the contraband to detectives for further  
23      investigation, correct?

24      A.           Yes.

1 Q. And when you -- when you were working  
2 in the jail and prison system in California, when  
3 the corrections officers found contraband, did  
4 they then turn it over to investigators or  
5 detectives to then build a case?

6 A. Yes.

7 Q. Okay. Back to Cantrell who's at the  
8 hospital.

9 When Cantrell returns from the hospital  
10 on April 9th, 2022, he's placed on suicide watch,  
11 correct?

12 A. Yes.

13 Q. Okay. And while he was on suicide  
14 watch, he's checked every 10 minutes, correct?

15 A. Yes.

16 Q. Okay. And in your experience as a law  
17 enforcement officer, people take drugs for various  
18 reasons, correct?

19 A. Yes, they do.

20 Q. Some people take drugs to get high and  
21 make themselves feel good, correct?

22 A. Yes.

23 Q. Some people take drugs to hurt  
24 themselves, correct?

1 A. That might be possible, yes.

2 Q. And some people take drugs because  
3 they're addicted to drugs, correct?

4 A. Yes.

5 Q. You reviewed the hospital records in  
6 this case, right?

7 A. On which instance?

8 Q. Well, let's start with on April 9th  
9 when he -- the first time he was sent to the  
10 hospital from the jail.

11 A. I don't think I -- I recall reviewing  
12 the medical reports of that situation.

13 Q. All right. Well, let's take a look.

14 Would you have wanted to review the  
15 hospital records?

16 A. Not necessarily, no.

17 - - - - -

18 Thereupon, Defendants' Exhibit 2 is marked  
19 for purposes of identification.

20 - - - - -

21 Q. Okay. Okay. You should see a record,  
22 that first line is personal valuables.

23 Do you see that?

24 A. Can you enlarge it a little bit?

1 Q. Yeah.

2 MR. GREEN: Andy, what exhibit is this,  
3 2 or 3?

4 MR. YOSOWITZ: This will be 2.

5 MR. GREEN: Okay.

6 A. A bit larger, please.

7 Q. All right. How's that?

8 A. That's great.

9 Q. Okay. So I'm showing you what we've  
10 identified as Exhibit 2. I'll represent to you  
11 that these are medical records from Southern Ohio  
12 Medical Center dated April 9th, 2022. I  
13 understand that you didn't review these?

14 A. I don't recall, no.

15 Q. Okay. I just wanted to -- okay. So in  
16 this part of the record for Mr. Cantrell, it  
17 indicates that he suffered an accidental overdose.

18 Do you see that?

19 A. I do see it.

20 Q. And that the context of the accidental  
21 overdose was "wanted to get high."

22 Do you see that?

23 A. Yes.

24 Q. Okay. And as we discussed in your

1       experience as a law enforcement officer, that's  
2       one reason that people take drugs, right?

3       A.           Yes.

4       Q.           Okay. Regardless, the jail decided to  
5       put Cantrell on suicide watch until he was cleared  
6       by mental health, correct?

7       A.           Yes.

8       Q.           And even though he said or he told the  
9       medical staff at the hospital that he wanted to  
10       get high, it was still reasonable and appropriate  
11       to put Mr. Cantrell on suicide watch when he  
12       returned from the hospital on April 9th, correct?

13      A.           Yes. I have no issue with that.

14      Q.           Okay. And so Mr. Cantrell was then  
15       seen by Shawnee Mental Health on April 10th  
16       between 7:36 and 7:52 a.m., correct?

17      A.           Yes.

18      Q.           And the mental health professional for  
19       Shawnee Mental Health did not believe that  
20       Cantrell was a continuing suicide risk and  
21       instructed the jail staff to follow the protocol  
22       for a non-suicidal inmate, correct?

23      A.           Yes.

24      Q.           Okay. And then about 10 minutes later,

1 officers attempted to place Mr. Cantrell into  
2 holding cell six and he refuses to go in, right?

3 A. That's correct.

4 Q. And that's when he says, fuck it, I'm  
5 going to go in here and overdose again, correct?

6 A. Yes.

7 Q. And the officers placed Mr. Cantrell in  
8 a restraint chair until he calmed down, correct?

9 A. Correct.

10 Q. You don't have any issue with that,  
11 right?

12 A. No.

13 Q. Eventually, Mr. Cantrell does go into  
14 holding cell six, right?

15 A. Yes.

16 Q. Okay. This is the same holding cell  
17 that just had recently been searched by the  
18 corrections officers, correct?

19 A. Yes.

20 Q. There was no reason for the officers to  
21 suspect that there were still drugs in holding  
22 cell six, correct?

23 MR. GREEN: Objection.

24 You can answer.

1           A.           Whatever the reasons were, safety and  
2 security of the facility and the inmates and  
3 staff.

4           Q.           Right. My question was: The officers  
5 had just recently searched this cell. At the time  
6 that they put Mr. Cantrell back in on April 10th,  
7 they didn't -- they didn't have any evidence that  
8 there were still drugs in that holding cell,  
9 correct?

10           MR. GREEN: Objection.

11           A.           No.

12           MR. GREEN: You can answer.

13           A.           Not that I'm aware of.

14           Q.           So even if one interprets the  
15 statement, "fuck it, I'm going to go in here and  
16 overdose again" as a statement of potential  
17 self-harm, the officers who were there knew that  
18 Cantrell had just been seen by a mental health  
19 professional and released from suicide watch 10  
20 minutes earlier, right?

21           A.           Correct.

22           Q.           Okay. And then there's no evidence  
23 that Cantrell made any further statements to the  
24 officers of self-harm on April 10th, 2022,

1       correct?

2       A.           Correct.

3       Q.           What the officers didn't know at the  
4                  time is that Cantrell had drugs stashed in his  
5                  rectum, correct?

6       A.           Wasn't --

7                  MR. GREEN: Objection.

8       A.           -- aware of that.

9       Q.           You're not aware that Cory Cantrell had  
10                 drugs stashed in his rectum?

11      A.           Oh, yes, okay.

12                  MR. GREEN: Objection.

13      A.           I'm sorry. I apologize. I was aware  
14                 of that.

15      Q.           Okay. Well, and we're going to talk  
16                 about that in a little bit more detail.

17                  At 4:30 a.m. the next day, April 11th,  
18                 the officers hear screaming and banging from  
19                 holding cell six, correct?

20      A.           Uh-huh, yes.

21      Q.           And when they arrive, they see Cantrell  
22                 rolling around on his mat screaming, right?

23      A.           Yes.

24      Q.           He's not responding to them, right?

1 A. Yes.

2 Q. And they administer Narcan and have him  
3 transported to the hospital, correct?

4 A. Yes.

5 Q. Okay. And you don't have any  
6 criticisms of the officers' response to Cantrell's  
7 overdose on April 11th, 2022, correct?

8 A. No.

9 Q. So at the hospital, Cantrell admits  
10 that he had drugs in his rectum and they had been  
11 there for about a week, correct?

12 A. Yes.

13 Q. And, in fact, he stated that he had  
14 been unable to have a bowel movement because it  
15 was, quote, up pretty high, end quote, correct?

16 A. Yes.

17 Q. In fact, the hospital couldn't even see  
18 the drugs on their CT scan, correct?

19 A. Yes, that's my understanding.

20 Q. And correctional officers are not  
21 radiologists, correct?

22 A. No, they're not.

23 Q. Even with scanning technology, it's  
24 difficult to see drugs inside someone's rectum or

1       bowels, correct?

2       A.           Yes.

3       Q.           In your years of correctional work, did  
4       you ever have inmates put things in their rectum?

5       A.           Yes.

6       Q.           Okay. What kinds of things did they  
7       put in their rectum?

8       A.           Oh, could be weapons, it could be  
9       drugs.

10      Q.           All right. So now we're at April 11th,  
11       2022, when Cantrell's now back at the jail from  
12       the hospital.

13      A.           Uh-huh.

14      Q.           Between -- well, and let me just -- the  
15       date -- the date that Cantrell overdoses and dies  
16       is June 18th, 2022, right?

17      A.           Correct.

18      Q.           Okay. So between April 11th, 2022, and  
19       June 17th, 2022, there's nothing in the record  
20       that you reviewed showing that Cantrell used drugs  
21       in the Scioto County Jail, correct?

22      A.           Yes.

23      Q.           So after the drugs are removed from his  
24       rectum -- strike that.

1                   After the drugs are removed from  
2 Cantrell's rectum on April 11th, 2022, and before  
3 Perry Steele smuggles in drugs in his rectum on  
4 June 18th, 2022, there's no evidence that Cantrell  
5 used any illegal drugs at the Scioto County Jail,  
6 correct?

7 A.               Yes, it is.

8 Q.               There was another incident on  
9 April 15th, 2022. Cantrell jumped off the top  
10 range of one of the housing pods, correct?

11 A.               Yes.

12 Q.               And he's taken to the hospital for  
13 evaluation, right?

14 A.               Yes.

15 Q.               It's certainly reasonable to send him  
16 to the hospital, correct?

17 A.               Yes.

18 Q.               And when he comes back from the  
19 hospital, he's placed on suicide watch again,  
20 correct?

21 A.               Yes.

22 Q.               And it's reasonable to place him on  
23 suicide watch because he just jumped off a tier,  
24 correct?

1 A. Yes, it is.

2 Q. Okay. And he's evaluated by Shawnee  
3 Mental Health that same day that he comes back  
4 from the hospital, correct?

5 A. Yes.

6 Q. And he tells them, Shawnee Mental  
7 Health, that he's not suicidal, correct?

8 A. Yes.

9 Q. The mental health professional wrote  
10 that Cantrell could return to general population,  
11 correct?

12 A. Yes.

13 Q. And the mental health professionals  
14 know more about mental health than the corrections  
15 officers do, correct?

16 A. Yes, they do.

17 Q. Okay. And that's why corrections  
18 sheriff's departments and prisons have mental  
19 health professionals to assess inmates who might  
20 be suicidal or not, correct?

21 A. Yes, that's -- that is correct.

22 Q. At -- you read -- you said you read  
23 Captain Roberts' deposition, right?

24 A. Yes.

1 Q. Okay. And Captain Roberts is the --  
2 what we call the jail administrator of the Scioto  
3 County Jail, correct?

4 A. Yes.

5 Q. Other jurisdictions might refer to that  
6 person as a warden. Do you understand that?

7 A. I've never heard that director of  
8 corrections or --

9 Q. Right.

10 A. But I've never heard to them referred  
11 to as the warden of a jail.

12 Q. Okay. But you understand that he  
13 oversees the jail, correct?

14 A. Yes.

15 Q. All right. And I know you haven't been  
16 to the jail, but based on his testimony, you  
17 understand that all of the housing pods at the  
18 Scioto County Jail are two-tiered, correct?

19 A. Yes.

20 Q. Meaning there's an upper level and a  
21 lower level, correct?

22 A. Lower level and upper level, yes.

23 Q. And the only place in the jail that's  
24 not two-tiered is the booking area with the

1 holding cells, correct?

2 A. Yes.

3 Q. And so because Cantrell jumped off a  
4 second tier, it would not be reasonable or smart  
5 to continue to house him in a multilevel housing  
6 area, correct?

7 A. Well, that could be one of the  
8 considerations, yes.

9 Q. It's reasonable to house him in the  
10 booking area where there's more supervision and no  
11 opportunity for him to jump, correct?

12 A. Correct.

13 Q. Did you review Mr. Cantrell's jail  
14 medical records?

15 A. No, I don't recall reviewing the  
16 medical records.

17 Q. Okay. Did you know that inmates have  
18 to be -- undergo a physical examination in Ohio  
19 within two weeks of their admission to the jail?

20 A. A physical examination?

21 Q. Correct.

22 A. No, I wasn't aware of that.

23 Q. Okay. Well, so because you didn't look  
24 at the records, you're not -- you don't know that

1       Cantrell was examined by the nursing staff on  
2       April 21st, 2022, correct?

3       A.           No.

4       Q.           Okay. And you don't know that part of  
5       that examination was a suicide risk assessment,  
6       correct?

7       A.           No, I don't.

8       Q.           Okay. And you don't know that during  
9       that examination, Cantrell denied that he had  
10      thoughts of killing himself, correct?

11      A.           Yes.

12      Q.           Right, you did -- and Cantrell was  
13      offered the opportunity to speak -- strike that.

14                  You don't know, because you didn't look  
15      at the record, that Cantrell was offered the  
16      opportunity to speak to a mental health  
17      professional and declined that, correct?

18      A.           I'm not aware of that, no.

19      Q.           Okay. In your report, you write that  
20      jail officers and personnel did not follow policy  
21      753, which is the medical policy, and 757, which  
22      is the suicide prevention policy, correct?

23      A.           Correct.

24      Q.           Which jail staff were you referring to?

1 A. The staff that took him from his cell  
2 to the -- what is it, the holding cell six.

3 Q. Okay.

4 A. They removed him from the cell.

5 Q. Okay. So the holding cell six was not  
6 the cell that he was ultimately in. You're --  
7 so --

8 A. Excuse me. Cantrell was moved from his  
9 cell that the officers felt that he was a suicide  
10 risk.

11 Q. Okay. What day are you referring to  
12 that this move happened on?

13 A. I don't recall the exact date at this  
14 point, but --

15 Q. As we've discussed, each time that  
16 Cantrell was on suicide watch, a mental health  
17 professional released him from suicide watch,  
18 correct?

19 A. It requires release by a mental health  
20 professional, yes.

21 Q. That's right. Even if the corrections  
22 officers wanted to release him from suicide watch,  
23 they couldn't do it without a mental health  
24 professional signing off, correct?

1 A. Correct.

2 Q. All right. Once the -- once the mental  
3 health staff has made a determination that  
4 Mr. Cantrell is not suicidal, there's nothing in  
5 the suicide prevention policy that requires the  
6 mental health permission to move an inmate from  
7 one cell to another, correct?

8 A. Right.

9 Q. Because at that point, he's just on --  
10 he's just in general population, correct?

11 A. Yes.

12 Q. Okay. And after April 15th, which was  
13 the date that he jumped from the second tier,  
14 there's no evidence that Mr. Cantrell made any  
15 statements of suicidal ideation, correct?

16 A. Yes, that's correct.

17 Q. Okay. And the -- similarly, the  
18 medical policy, there's nothing in that policy  
19 that requires permission of the medical staff to  
20 move an inmate to or from a holding cell, correct?

21 A. I'm sorry, ask that question again.

22 Q. Sure. Nothing in the medical policy,  
23 which was 753, that requires the permission of the  
24 medical staff to move an inmate to a holding cell,

1 | correct?

2 MR. GREEN: Objection.

3 You can answer.

4 A. Correct.

5 Q. Okay. All right. You understand that  
6 an inmate named Perry Steele was alleged to have  
7 brought drugs in to the Scioto County Jail,  
8 provided those drugs to Cory Cantrell, and  
9 Cantrell overdosed on those drugs, correct?

10 A. Yes.

11 Q. And, in fact, Perry Steele was  
12 criminally charged with manslaughter and went to  
13 trial on that case, correct?

14 A. Yes.

15 Q. Okay. I want to talk about, first,  
16 body cavity searches.

17 | Are you familiar with those?

18 A. Yes, I am.

19 Q. All right. And you understand that in  
20 order to perform a body cavity search, there has  
21 to be probable cause that the person currently has  
22 drugs in a body cavity, correct?

23 A. Yes.

24 O. And a body cavity search requires a

1 search warrant signed by a judge or a magistrate,  
2 correct?

3 A. No, not to my knowledge. It's a  
4 custody decision based on custody personnel.

5 Q. So as we sit here today, it's your  
6 understanding that a body cavity search could be  
7 conducted without a warrant?

8 A. To my knowledge, yes, that's correct.

9 Q. Okay. If -- well, you're not familiar  
10 with all of Ohio's laws, correct?

11 A. No, I am not.

12 Q. Okay. You haven't worked as a  
13 corrections officer in Ohio, correct?

14 A. Correct.

15 Q. So you would not know that there's an  
16 Ohio statute which states that a body cavity  
17 search requires a warrant, correct?

18 A. I'm not aware of that, no.

19 Q. And certainly if that's the law in  
20 Ohio, corrections officers in Ohio would be bound  
21 to follow that law, correct?

22 A. Yes.

23 Q. Okay. The mere fact that an inmate is  
24 arrested on a drug charge does not provide

1       probable cause to do a body cavity search,  
2       correct?

3                   MR. GREEN: Objection.

4                   You can answer.

5       A.           Well, it depends on the decision of  
6       custody; if they want to do a more thorough search  
7       of the arrestee.

8       Q.           Okay. Okay. I'm going to represent to  
9       you that Ohio Revised Code §2933.32 states that  
10      unless there's a legitimate medical reason or  
11      medical emergency justifying a warrantless search,  
12      a body cavity search shall be conducted only after  
13      a search warrant is issued that authorizes the  
14      search.

15                  Okay?

16       A.           Okay. Let me clarify something on your  
17      question. Are you talking about an intrusion body  
18      cavity search?

19       Q.           Oh, yes. Yes.

20       A.           Okay. I'm sorry, I thought you just  
21      meant a strip search.

22       Q.           No. No. And maybe that's good that we  
23      clarified that.

24                  So a strip search, based on my

1 understanding of what they do at the Scioto County  
2 Jail and other jails in Ohio, is where they  
3 observe the inmate remove their clothing, it has  
4 to be an officer of the same sex, and then they'll  
5 typically have the inmate squat and cough?

6 A. Yes.

7 Q. And they will also, for females,  
8 have -- like have them lift their breasts and then  
9 the inmate will take a shower and be issued jail  
10 clothing. Is that what you understand a strip  
11 search to be?

12 A. I don't know about issuing showering  
13 and all that, but I understand what a strip search  
14 is, yes.

15 Q. Okay. A body cavity search is actually  
16 going into the body cavity of a person and pulling  
17 out whatever you find?

18 A. Yes.

19 Q. Okay. Does that -- to go into  
20 somebody's body cavity, does that require a  
21 warrant in California?

22 A. Not that I recall. Requires medical  
23 personnel to do that.

24 Q. Okay.

1 A. But I don't recall a warrant required.

2 Q. You're familiar with the concept of  
3 probable cause for a warrant, correct?

4 A. Yes, I am.

5 Q. You've applied for search warrants  
6 before, correct?

7 A. Not that I recall. Not as a warden or,  
8 you know, in administration.

9 Q. Okay. Well, there was no indication on  
10 Perry Steele's June 18th, 2022, body scan that he  
11 was secreting any contraband or drugs in his  
12 rectum, correct?

13 A. That's correct.

14 Q. Prior to Cory Cantrell's overdose,  
15 corrections officers did not have any information  
16 that Perry Steele was secreting drugs in his  
17 rectum, correct?

18 A. Correct.

19 Q. And then on the -- on June 18th, 2022,  
20 the other inmates in the holding cell with Cory  
21 Cantrell didn't summon assistance until Cantrell  
22 started foaming at the mouth, correct?

23 A. Yes.

24 Q. And as soon as the inmates summoned

1 assistance, officers got Cantrell out of the cell  
2 and began performing CPR, correct?

3 A. Yes.

4 Q. Officers performed CPR on Mr. Cantrell  
5 until the paramedics arrived, correct?

6 A. Yes.

7 Q. And it was reasonable and appropriate  
8 to perform CPR on Cory Cantrell, correct?

9 A. Yes.

10 Q. The officers retrieved and applied an  
11 automated external defibrillator to Cory Cantrell,  
12 correct?

13 A. I don't recall that the -- that  
14 equipment was authorized. I mean, I don't think  
15 there was any indication that should be used to  
16 the best of my recollection.

17 Q. Well, Cory Cantrell was in cardiac  
18 arrest, correct?

19 A. Yes, I believe so.

20 Q. And you understand that defibrillators  
21 are used for people who are in cardiac arrest,  
22 correct?

23 A. That -- it can be used, yes.

24 Q. Okay. And the purpose of a

1       defibrillator is to try and restart the heart,  
2       correct?

3       A.           Yes.

4       Q.           Okay. If the video of the  
5       resuscitation shows the officers obtaining an  
6       automated external defibrillator and applying  
7       that, you don't have any reason to dispute that,  
8       correct?

9       A.           I didn't see any video of that  
10      treatment, no. But I don't have any objection to  
11      it if that's what they decide to do.

12      Q.           You were not provided with the  
13      treatment of the -- strike that.

14                  You were not provided with the video of  
15      the resuscitation?

16      A.           Not to my recollection, no.

17      Q.           Okay. Well, based on the records that  
18      you read, do you have -- do you have -- do you  
19      dispute that the officers were trying to save Cory  
20      Cantrell's life?

21      A.           Nope.

22      Q.           Okay. Your criticism of the officers'  
23      resuscitative efforts is that they did not  
24      administer Narcan, correct?

1 A. No Narcan was administered, that's  
2 correct.

3 Q. But the paramedics didn't administer  
4 Narcan either, correct?

5 A. Not to my recollection, no.

6 Q. And the doctors at the hospital didn't  
7 administer Narcan either, correct?

8 A. Correct.

9 Q. You -- you're not a medical  
10 professional, correct?

11 A. That's correct.

12 Q. You do not know whether the use of  
13 Narcan is indicated when a person is in full  
14 cardiac arrest, correct?

15 A. No. I'm not a medical doctor. I don't  
16 have an opinion on that.

17 Q. Okay. In your -- did you -- you had  
18 36 years in corrections?

19 A. Yes, I did.

20 Q. Okay.

21 A. In California.

22 Q. In California.

23 Were there any drug overdoses in any of  
24 the correctional facilities that you oversaw?

1 A. Yes.

2 Q. Was there ever contraband smuggled into  
3 any of the correctional facilities that you  
4 oversaw?

5 A. Yes.

6 Q. What's the most unusual technique you  
7 ever saw an inmate use to try and get contraband  
8 in?

9 A. An --

10 MR. GREEN: Objection.

11 A. -- inmate?

12 MR. GREEN: You can answer.

13 A. I'm sorry, I --

14 Q. Yeah, an inmate?

15 A. Rectum.

16 Q. Rectum?

17 A. Rectum stashes is the most common.

18 Q. Since you retired from active  
19 correction -- you know, active law enforcement  
20 duty, you've been, like, a corrections consultant,  
21 correct?

22 A. I have been, yes.

23 Q. Okay.

24 A. I am.

1 Q. You are?

2 A. Yes.

3 Q. Do you know of any correctional  
4 facility that's able to keep all contraband out?

5 A. No, there's not.

6 Q. Okay. When's the last time you  
7 actually worked full-time in a correctional  
8 facility?

9 A. Been many years. I think the last time  
10 I worked in a facility was in -- I left in 2000.

11 Q. Okay. And so then what -- since 2000,  
12 what's been your business? What have you been  
13 doing?

14 A. Well, I've been consulting since 1986  
15 to the present.

16 Q. Okay. And what percentage -- you  
17 obviously do expert work, right?

18 A. Yes.

19 Q. What percentage of your work is expert  
20 work versus consulting work?

21 A. I'm not sure if I understand the  
22 difference.

23 Q. Sure. Let me --

24 A. Can you be more specific?

1 Q. Yeah.

2 When I say expert work, I mean when  
3 you're testifying as an expert witness in a  
4 criminal or civil case.

5 A. Okay.

6 Q. Okay. When I think of consulting, I  
7 think of that as you going to a correctional  
8 facility and telling them, this is good, you  
9 should do this, you should do -- you know, giving  
10 them direction on how to do things.

11 Does that make sense?

12 A. That can happen, yes.

13 Q. Okay. So what I was trying to get a  
14 sense of is what percentage of your work is doing  
15 expert work in criminal and civil cases versus  
16 doing consulting work with various jails and  
17 prisons?

18 A. I'm sorry, Counsel, I don't understand  
19 your question --

20 Q. Okay.

21 A. -- how to respond to that.

22 Q. All right. I'll get back to it.

23 A. Okay.

24 Q. This will be an easier question.

1 A. Okay.

2 Q. Have you ever worked with the law firm  
3 Shapero & Green before this case?

4 A. Not to my recollection, no.

5 Q. And then how much so far have you been  
6 paid on this case?

7 A. I think it's -- I think it was about  
8 9,000 -- 9,000 and some change, 36 hours.

9 Q. You -- you provide expert services for  
10 attorneys who are in civil and criminal cases,  
11 correct?

12 A. Yes.

13 Q. Okay. About how much income per year  
14 do you derive from that work?

15 A. Well, it depends how many cases I have.  
16 You know, there are sometimes where I've made over  
17 100,000 of consulting and sometimes much less than  
18 that.

19 Q. Okay. Have you ever served as an  
20 expert witness on behalf of corrections officers?

21 A. On behalf -- on behalf?

22 Q. Sure. Or on the side of corrections  
23 officers?

24 A. In their defense, is that what

1       you're --

2       Q.           Yes.

3       A.           Yes, I have.

4                   MR. YOSOWITZ: Mr. Vasquez, I think  
5                   that's all the questions I have.

6                   THE WITNESS: Okay.

7                   MR. YOSOWITZ: I appreciate your time.

8                   I hope you're feeling better from last week.

9                   THE WITNESS: I am much better. Much  
10                  better.

11                  MR. YOSOWITZ: And that's all I've got,  
12                  Brian.

13                  MR. GREEN: Thank you. Very good.  
14                  We'll take a copy if this is typed.

15                  (Signature not waived.)

16                  - - - - -

17                  Thereupon, the foregoing proceedings  
18                  concluded at 4:10 p.m.

19                  - - - - -

20

21

22

23

24

1 State of Ohio : C E R T I F I C A T E  
2 County of Franklin: SS

3 I, Mary Bradley, RPR, CRR, a Notary Public in  
4 and for the State of Ohio, certify that Daniel  
5 Vasquez was by me duly sworn to testify to the  
6 whole truth in the cause aforesaid; testimony then  
7 given was reduced to stenotype in the presence of  
8 said witness, afterwards transcribed by me; the  
9 foregoing is a true record of the testimony so  
given; and this deposition was taken at the time  
and place specified on the title page.

10 Pursuant to Rule 30(e) of the Federal Rules of  
11 Civil Procedure, the witness and/or the parties  
12 have not waived review of the deposition  
transcript.

13 I certify I am not a relative, employee,  
14 attorney or counsel of any of the parties hereto,  
15 and further I am not a relative or employee of any  
16 attorney or counsel employed by the parties  
17 hereto, or financially interested in the action.

18 IN WITNESS WHEREOF, I have hereunto set my  
19 hand and affixed my seal of office at Columbus,  
Ohio, on December 31, 2024.

20 A handwritten signature in black ink, appearing to read "Mary Bradley". To the right of the signature is a small, separate circular mark or seal.

21 Mary Bradley, RPR, CRR, Notary Public - State of  
22 Ohio. My commission expires September 19, 2029.  
23  
24

Witness Errata and Signature Sheet  
Correction or Change Reason Code  
1-Misspelling    2-Word Omitted    3-Wrong Word  
4-Clarification    5-Other (Please explain)

Page/Line      Correction or Change      Reason Code

I, Daniel Vasquez, have read the entire transcript of my deposition taken in this matter, or the same has been read to me. I request that the changes noted on my errata sheet(s) be entered into the record for the reasons indicated.

Date \_\_\_\_\_ Signature \_\_\_\_\_

Ref: Mb313319dv

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